SUMMARY OF RESPONSES
TO
MINISTRY OF FORESTS
PUBLIC INVOLVEMENT POLICY & PRACTICE

PREPARED BY:
LAURA H. DOLINER
FOR
DR. BRUCE FRASER
CONSULTANT ON PUBLIC INVOLVEMENT

The following pages are a compilation of comments received by the Ministry of Forests concerning its Public Involvement policy and programs. Letters, workshop transcripts and interviews have been excerpted and edited for clarity and conciseness. The material is arranged by categories to facilitate its consideration by the Ministry of Forests Executive in their forthcoming review of the Interim Public Involvement Policy.

We invite you to read through this summary to see if any concerns or suggestions you might have are recorded. If you find any gaps, please tell us about them.

P L E A S E R E S P O N D

SEND YOUR ADDITIONS AND COMMENTS

CATEGORIZED IN TERMS OF THE HEADINGS IN THE TABLE OF CONTENTS

By MAY 31, 1982

TO: CARL HIGHSTED
DIRECTOR
PLANNING BRANCH
MINISTRY OF FORESTS
1450 GOVERNMENT STREET
VICTORIA, B.C. V8W 3E7

TABLE OF CONTENTS:

		Page Nos.
I	Sponsored Groups - Terms of Reference	
	A. Setting the Terms of Reference	1
	B. Options Open for Consideration	2
	C. Advisory vs. Decision-Making Status	3
II	Sponsored Groups - Process	4 - 5
III	Sponsored Groups - Support	
	A. Access to Information	6
	B. Expenses	7 - 8
	C. Research	9
IV	Sponsored Groups - Recommendations Of	10
V	When should Public Involvement be Part of the Planning Process?	
	A. What Plans require Public Involvement?	11
	B. Level and Stage of Planning	12 - 13
	C. Other	14
VI	Relationship Between Ministry of Forests and Sponsored Groups	
	A. "Chain of Command"	15
	B. Staff Requirements	16
	C. Conduct of Discussions	17
	D. Impact of Public Involvement on other Ministry of Forests Programs	18
	E. Initiation of Public Involvement	19
	F. Other	20
VII	Review of TSA Plans	21
VIII	Industry Participation in Public Involvement/ TFL Plans	22
IX	Coordination/Cooperation among Ministries	23

TABLE OF CONTENTS (continued)

		Page Nos.
X	Evaluation of Public Involvement Processes	
	A. Reporting and Documentation	24
	B. Criteria for Evaluation	25
	C. Effectiveness: Influence on Resource Management	26
	D. Credibility	27 - 28
XI	Editorial Suggestions	29 - 31

We thank the following individuals and groups for their comments:

Public Involvement participants:

Thomas J. Barnett, Chairperson, Tahsish Task Force
Paul A. Griffiths, member, Tahsish Task Force
H.R. McArthur, Nelson and Area Watershed Committee
R.W. Nixon, Sierra Club of Western Canada

Ministry of Forests staff:

Gordon Erlandson, Resource Planner, Nelson Forest Region
Harry N. Marshall, Director, Recreation Management Branch
Gary Sutherland, Planning Officer, Vancouver Forest Region
Pem van Heek, Landscape Manager, Recreation Management Branch

Public Involvement Coordinators:

Duncan Dow, Resource Planner (Smithers Forest District)
Steve Perks, Planning Coordinator (Port Alberni Forest District)
Al Niezen, Resource Assistant (Campbell River Forest District)
Norm MacLeod, Public Involvement Coordinator (Cranbrook Forest District)

Participants in Public Involvement Training Seminars, held at the Green Timbers Training School (comments summarized by Ted Richardson, Aprotek Design).

Ministry of Environment Staff:

Susan Abs, Environmental Analyst, Assessment Branch

Industry representatives:

Land Use and Environment Committee of the B.C. Council of Forest Industries.

R.E. Urban, Manager, Land Use Liaison, Woodlands Services, MacMillan Bloedel, Nanaimo.

Joint Committees:

Forest Land Use Liaison Committee (representatives of industry, unions, universities, and public interest groups).

Consultants:

Dr. Bruce Fraser, Consultant on Public Involvement to the Planning Branch, Ministry of Forests.

.../2

Evaluators of Public Involvement Programs:

Evelyn Feller, Master of Resource Management program, Simon Fraser University.

Steve Fuller, Cordillera Environmental Projects Ltd., Vancouver.

Jenny Parkinson, Faculty of Forestry, University of British Columbia.

Don van der Horst, Master of Resource Management program, Simon Fraser University.

Ted Richardson, Aprotek Design, Vancouver.

Meetings and Workshops:

Nelson Watershed meeting: representatives of City of Nelson, Nelson and Area Watershed Committee, Ministry of Forests; Nelson, January 14, 1982.

Public Advisory Committee Lay Members' Seminar and Workshop; Vancouver, November 1981.
Recommendations summarized by K. Farquharson, Chairman, Outdoor Recreation Council of B.C.

Tahsish meeting: representatives of the Tahsish Task Force, with Mike Apsey, Deputy Ministry of Forests, and Dr. Bruce Fraser; Victoria, December 10, 1981.

I Sponsored Groups - Terms of Reference

A. Setting the Terms of Reference:

1. ToR must be clearly stated.

2. ToR should be developed by the sponsored group, with advice from MoF, and subject to government approval.

3. Evaluators disagreed as to whether ToR should be set out in advance by MoF or developed in discussions of the sponsored group itself.

4. a) The ToR should define study area boundaries and time limits for the sponsored group.

   b) Boundaries of study areas should be dictated by the pattern of the resources being considered, not by MoF administrative units. (Spruce Lake planning should have extended into the Cariboo Forest Region, but that region would not agree to it).

5. The ToR should allow for presentation of dissenting views in the final report.

B. Options Open for Consideration:

1. Key question is whether "no development" is an available option. If the wilderness option has been ruled out before the public involvement process begins, this should be made explicit.

2. ToR which are constrained "from above" in this way may not be acceptable to some public members. This can put the whole public involvement process into question.

3. There should be a mechanism available for public consideration of a preservation option for a given area. The MoF may not be the appropriate agency to coordinate this. A public group sponsored by some governmental body with a status above that of the agencies directly concerned with resources (similar to the former ELUC Secretariat) would be the preferred route.

4. Discussion of a preservation option tends to break down working relationships among agencies.

5. Consideration of development/no development question is really a matter of allocation of resources. As such, it may be a more appropriate subject for the political process than for a MoF sponsored public involvement program.

6. Reduction in Annual Allowable Cut (AAC) should be an available management option, and should be stated as such in the ToR.

7. When a preservation option is to be considered by a Public Involvement Committee as part of a study of conflicting land uses, the Government should establish a moratorium on land alienation and mineral staking in the designated study area. The regional AAC should be reduced by the amount contributed by the study area until the decisions on future land use are made by the committee.

C. Advisory vs. Decision-Making Status:

1. Advisory-only status of sponsored groups must be made clear to participants.

2. Advisory status is not satisfactory to some members.

3. If public advisory committees were to gain decision-making power while their establishment rema ned discretionary, the MoF might be reluctant to set them up in the first place.

4. As an alternative to giving decision-making status to sponsored groups, the final management plan should be presented at a public hearing, so that whatever decision was made in the end would have to be defended to us all.

5. Members of the Nelson Watershed Committee are concerned about enforcement of the operational guidelines they are preparing. A more formal structure, such as a joint planning team, with decision-making and enforcement authority, may be required.

II Sponsored Groups - Process

1. a) Choice of Chairperson is critical: must be fair, objective, and skilled at conducting meetings.

   b) Chair should be person with decision-making authority, acting as liaison between sponsor agency and the group.

   c) The Chairman shall be appointed by the sponsored group itself, subject to approval of the Minister or designate.

2. MoF sometimes tries to push members of sponsored groups to represent interests beyond their real constituencies.

3. Meeting locations and times should be established by consent of the group and be designed to allow the greatest number of members to attend.

4. Participant input must be constructive and tangible, rather than philosophical, and must be documented by written submissions.

5. Chair should be aware of opinions and feelings of all group members: silence does not always mean agreement. This is crucial for decision-making by consensus.

6. Discussions must be conducted so as to permit free expression of all opinions.

7. a) Minutes must be accurate and complete, taken by a professional secretary familiar with resource management work.

   b) Continuity of record keeping should be improved.

8. The MoF should develop a mechanism to allow interchange of information between the various sponsored groups active at a given time.

9. Groups should set concrete goals, defined end products, and firm schedules.

10. Scheduling:

    a) Some participants felt they had been pressured to produce their recommendations in an unrealistically short time.

    b) The sponsored group must have adequate time to assemble necessary information before developing the land use options to be studied.

    c) The public involvement process must quickly be seen to produce results, because representatives of public interest groups need to demonstrate to their constituents that their time has been well spent serving on MoF sponsored committees.

11. Several quasi-legal powers have been suggested for Public Advisory Committees, including:

    a) the right to convene proponents and opponents of land use proposals under consideration;

    b) the right to cross-examine and to require sworn evidence;

    c) the right to conduct public hearings in review of a TFL renewal, TFL or TL working plans, or regional AAC's.

III Sponsored Groups - Support

A. Access to Information.

1. MoF response to requests for information must be much faster: long delays give the impression that the sponsored group is not considered important.

2. Maps and information from different sources did not correlate well (different scales, different management unit boundaries). This makes it very difficult to integrate information.

3. PAC decisions are often influenced by economics. Where these are an issue in consideration of land use options, the Ministry of Forests shall derive and provide to the PAC site and region specific data as requested by the PAC from government or other sources.

4. a) Information was poorly presented. MoF people must act as educators. Technical documents should be interpreted for public members.

   b) Public members are generally not well-informed about forestry practices. A kit of background information, including a glossary, could be designed.

5. Release of documents should be approved by manager who initiates the P.I. activity.

6. When a PAC is established to review conflicting proposals for forest land management, it shall be endorsed by Cabinet, through the Chairman, with the right of access to government resource agency staff and data, both within and without the Ministry of Forests, or if this information is not available, a reason given, and to industry data on Crown resources if necessary.

7. Government should establish a policy for access to information which will be uniform for all agencies.

B. Expenses:

1. Costs of services rendered (e.g. secretarial) should be recorded.

2. An operating budget should be established for each sponsored group. The groups themselves should then be responsible for allocating these funds.

3. The MoF should consider setting up a central fund for public involvement, because the need for specific programs cannot always be anticipated in advance.

4. Some members of sponsored groups want the MoF to reimburse them for personal expenses related to their participation.

5. Some members want a per diem payment, to compensate for wages lost when meetings are held during regular working hours.

6. Members have resigned from some sponsored groups because they cannot afford the expense of participation. This makes the group less representative of the average B.C. citizen, and of the full range of interests concerned with the land management issue being considered.

7. Ministers have referred inquiries from the general public to members of sponsored groups. Providing copies of reports in such cases has meant additional expense for the public group member.

8. Potential problems with payment of participant expenses:

   a) Total costs of public involvement activities may be very difficult to control.

   b) The increased cost of an event or program which allows expenses may discourage MoF sponsorship, regardless of need.

   c) It may be difficult to impose controls without appearing to arbitrarily limit certain participants, and therefore their constituencies, from having a voice in the proceedings.

d) It may be difficult to impose limits on the distance from which people may legitimately come at public expense. Travel situations vary greatly in the Province, and therefore consistency may be difficult to achieve.

9. Does healthy public volunteerism perish if public involvement activity by citizens is financially supported? Is the independence of the citizen impaired if s/he accepts public funds to become a participant on behalf of a constituency? Where does "civic duty" end and "reimbursed service" begin?

10. Proposals:

a) Payment for personal expenses, at standard rates set by the MoF, should be made at the discretion of each sponsored group, and should come out of the operating budget of the group.

b) Eligibility for such payments should be based on the following criteria:

i) the member and group s/he represents could not afford to participate if expenses were not subsidized.

ii) the individual member has an established record of commitment to the represented public interest.

iii) receipts for expenses are kept.

iv) the contribution of the member is necessary, substantial, and distinct from that of other members.

c) An alternative to providing reimbursement for personal expenses would be to organize activities of sponsored groups so as to minimize cost and inconvenience to public members.

C. Research:

1. Research commissioned by sponsored groups should be carried out by researchers not connected with MoF or industry.

2. The policy statement (6(e)), could specify the types of research which come under the MoF mandate, and indicate that the Ministry cannot provide funds for studies which are the responsibility of other agencies.

3. Research studies on the social and economic impact of management options under consideration should be carried out.

4. MoF budgets should be flexible enough to provide funding of research to fill data gaps revealed during the public involvement process.

5. In 50% of the Sub-Unit plans, additional studies will have to be done. These studies are not only expensive but the time required to do them and to analyze the results can take as long as 2 to 5 years - slope stability, 2 years, hydrological data, 5 years. We have neither the money nor the lead time to do some of these studies being requested by the public.

IV Sponsored Groups - Recommendations Of

1. a) End products of public involvement should be concrete and specific, preferably expressed in technical terms.

   b) Agency staff should advise/assist sponsored groups in the production of end products which are usable inputs to management decision-making.

2. Management plans produced have been disjointed sets of separate plans for various resources. It is difficult to determine how these sub-plans impact on each other. Integration of planning for various resources should be improved.

3. The ToR should allow for presentation of dissenting views in the final report.

V When Should Public Involvement be Part of the Planning Process?

A. What Plans require Public Involvement?

1. a) Criteria for identifying situations requiring public consultation should be developed.

   b) The policy should include more explicit criteria as to which projects/plans will include public involvement, as well as what kind of public involvement process will be used, and to what lengths it will be carried out.

2. Could public involvement be a means of educating people about forestry practices and problems? Could this be a factor in deciding where to initiate public involvement?

3. The routine planning process should include identification of potentially controversial areas (such as community watersheds) for initiation of public involvement.

4. The areas in which agreement among resource users has been most difficult to reach have been those where domestic water use is taking place, because of the absence of a substitute for quality water.

B. Level and Stage of Planning

1. Guidelines for choosing level and stage of planning most appropriate for public involvement should be developed.

2. Resource development of an area should not be allowed to proceed until the sponsored group has made its recommendations and the final management plan has been approved.

3. a) Level of planning is a key choice.

   b) Level of planning, and the implications of this, must be made clear to participants.

4. a) It is important to work at District or Regional level, to identify issues and possible trade-offs.

   b) Timber Supply Areas may be too large in size for effective public involvement work, because a sponsored group would require many members to be representative. Supply block level might be preferable.

   c) If public involvement occurs above or before operational planning, recommendations may have to be in the form of general guidelines. If these are open to wide interpretation, the public involvement exercise will have been futile.

   d) There is a need to ensure that watershed planning problems can be handled locally, and that unnecessarily high profiles be avoided.

5. a) Solution to these contradictory requirements is in two levels of public involvement: whole District (or larger) and individual watershed.

5. b) In order to make the task of resolving local issues easier, the issues that are regional or provincial in scope should be isolated and discussed at the appropriate level. What is required is a public involvement handbook of procedures to be used at the Regional and Provincial planning level.

   Removing unresolvable problems from local public involvement issues will allow the local programs to function more efficiently and with less confrontation. The same basis rationale can be used for the issue of land allocation or land re-allocation, i.e., logging or not logging specific watersheds that have been contractually committed to forest harvesting and management.

6. Boundaries of study areas should be dictated by the pattern of the resources being considered, not by MoF administrative units. (Spruce Lake planning should have extended into the Cariboo Forest Region, but that region would not agree to it).

7. a) Some public members want to participate in initial issue identification or in development of management options, while others would prefer to comment on already formulated draft plans.

   b) Re TSA planning: Public participation is appropriate in initial issue identification and in review of draft final plans; involvement in development and evaluation of management alternatives may not be feasible because the TSA planning process is unclear.

C. Other:

1. The MoF should plan a series of seminars on public involvement. Government personnel, industry representatives and the general public should all be invited to participate. Such an educational program could insure that all parties start out with a common understanding of public involvement rules and guidelines. It could also introduce the participants to opposing points of view and familiarize lay people with resource management concepts and terminology.

VI Relationship Between Ministry of Forests and Sponsored Groups

A. "Chain of Command"

1. Problems have arisen when public involvement terms of reference or schedule of activities set up at one administrative level are changed in midstream by a more senior level.

2. a) MoF staff do not have mandate to answer questions or make decisions outside their local areas (e.g., sponsored group members asking District Manager to show a reduction in Annual Allowable Cut as a result of public involvement).

   b) MoF staff working with sponsored groups seem to have a sense of uncertainty and of defense of the status quo, because nobody has really firm instructions or knowledge as to how far alteration can be accepted.

3. Members of the Nelson Watershed Committee were concerned that decisions of the proposed Integrated Watershed Management Planning team might be overruled by higher authority within the MoF or by the Minister himself.

4. Recommendations:

   a) The policy should specify reporting and decision-making relationships regarding public involvement amongst administrative levels.

   b) Operating procedure as outlined in the policy is too loose - responsibilities are not delineated well enough.

   c) Districts should only participate in public involvement processes which concern operational plans. When land allocation issues and TSA management implications are raised by the public, Regions should conduct public involvement.

   d) A staff member to whom ongoing public involvement activity has been delegated, should keep his/her senior informed about discussions of the sponsored group. If the senior management official disagrees with what is going on, s/he should respond immediately, rather than wait to reject the final outcome of the public involvement process.

B. Staff Requirements:

1. A public involvement coordinator for each District and Region is required if the activities prescribed in the policy statement are to be carried out adequately.

2. Effective public involvement requires high-profile qualified people at decision-making levels. Members of sponsored groups do not want to deal with public relations officers nor with staff lacking the authority to make commitments. Experienced staff are needed to handle complex resource allocation questions.

3. Regional Manager should have higher profile.

4. The policy should specifically refer to the role of District Managers.

5. Lack of continuity in staff assigned to public involvement is very inconvenient.

6. Public involvement requires substantial amounts of overtime work. MoF staff should be compensated for this.

C. Conduct of Discussions:

1. If Ministry of Forests positions are based on premise that the Province is running out of timber, they must explain this to public members, who think there are plenty of trees everywhere.

2. MoF staff should debate more openly, give the benefit of their experience, demonstrate reasons/evidence for their positions. They should take a much more active, responsible and positive role in discussions.

3. a) District Managers and field staff should be trained to handle public involvement situations effectively and to communicate technical material to lay-people.

   b) The MoF should now develop an intensive training program for staff who will be expected to deal with public involvement. Areas of training that could be useful include:

      how to effectively run a meeting;
      how to write terms of reference;
      how to best organize a public involvement group;
      how to organize and/or write a report;
      public speaking;
      methods of assessing real vs. perceived issues, etc.

4. Some members of sponsored groups felt they had been pressured by MoF staff to complete their work in an unrealistically short time.

5. Ministry of Forests should stand by agreements made - if harvest is to be deferred in a given area, adding provision for salvage logging of beetle-killed stands appears to members of sponsored groups as a reversal of the decision to defer. Ministry of Forests should not have agreed to deferral in the first place if salvage logging was considered essential.

6. MoF staff will need more training before they can effectively discuss technical developments with "groups in the professional and technical forestry community", as specified in policy statement #1.

D. Impact of public involvement on other Ministry of Forests Programs:

1. Unless public involvement is allocated sufficient extra funding, it will compete with established, operational programs for money and staff time. MoF operations will suffer and the stated commitments to public involvement will not be fulfilled.

2. Administrative level which initiates a public involvement activity should pay for it.

3. The MoF should consider setting up a fund specifically earmarked for public involvement.

4. Additional studies requested by sponsored groups, as well as the public involvement activities themselves, will greatly increase the time required to produce TSA and sub-unit plans.

E. Initiation of Public Involvement:

1. Role of District Manager in identifying resource issues within TSA's should be specified in the policy statements.

2. Agency initiation of contact with community groups, interest groups, and other members of the public, is much more effective than media advertisements calling for submissions.

3. Comment on TSA draft plans should be solicited from environmental, recreation and other groups which might be expected to be concerned.

4. In Chilliwack, only 20% of the recreational users are members of organized recreation groups. The interests of the non-organized general public should somehow be represented in the sponsored group.

F. Other:

1. There appears to be some inconsistency regarding public involvement within the MoF Executive. Operations Division does not consider public involvement a high priority.

VII Review of Timber Supply Area Plans

1. With public involvement, it will take two years instead of one to set the AAC for a TSA.

2. It is not clear to MoF staff how public involvement will/can fit in with TSA planning. The TSA may not be an appropriate level for public involvement, due to its large size, and the lack of specificity of TSA plans.

3. Consideration of recreational values should be part of the regular planning process.

4. TFL's should be included in the TSA analysis.

VIII Participation of Industry in Public Involvement: Tree Farm Licence Plans

1. Effective public involvement requires high-profile qualified people, i.e., upper level industrial managers, imposing great demands on their time. Companies, especially smaller ones, cannot afford this.

2. a) Process for TFL plans could be streamlined. Progress in some programs is very slow, resulting in delays in making decisions. This can be very costly to both Province and industry.

   b) TFL responsibilities should be more specific; Section 4(c) of the Forest Act should be quoted in the policy statement.

   c) Licensees should be given guidelines regarding how to solicit and respond to public submission re TSA plans.

3. TFL planning should have the same public input opportunities and requirements as TSA planning does.

4. Industry has been forced into the role of forestry advocate in public involvement. MoF should be doing this.

5. a) The minimum public review period of the TFL Management and Working Plans (p. 7-5) may have to be longer than 30 days. A 30 to 90 day period should be stipulated.

   b) In the case of Meares Island, the TFL review period was too short. The working plans were approved before the public group could complete its review. They are now in the less advantageous position of pushing for reduction of AAC in the already approved plan.

IX Co-ordination/consistency among Ministries

1. a) Other agencies do not have to cooperate with a MoF public involvement process or abide by the results. This can result in development of an area proceeding without check, in spite of public members spending a lot of time participating in MoF sponsored groups. No existing legislation or structure provides authority for planning which is binding on all land-use Ministries.

   b) MoF might not be appropriate agency to co-ordinate public involvement in complex cases involving many resource types. But who should?

   c) When land and resource allocations are under consideration, a public group sponsored by some governmental body with a status above that of the agencies directly concerned with resources (similar to the former ELUC Secretariat) would be the preferred route.

2. How is MoF program fitting in with the Land Use Act? The Planning Act?

3. Management units and administrative boundaries vary among Ministries. This makes it difficult to integrate information to come up with an overall plan.

4. Agencies should not be pushed into involvement (with an Integrated Watershed Management Planning team) through the Regional Resources Management Committee if their participation is not required. This can result in falsely generated interest and an inability to produce a viable management compromise.

5. The MoF should make a concerted effort to have their policy and handbook accepted by key Ministries who will be involved in the process.

X Evaluation of the Public Involvement Process

A. Reporting and Documentation:

1. Public Involvement programs should be well documented as to design, activities, and methods used.

2. a) Public Involvement programs should be evaluated for effectiveness and efficiency.

   b) An evaluation of public involvement processes used and results obtained should be published.

3. a) The Annual Report should be accurate record of any controversy in public involvement programs, including issues that were debated and divergent opinions expressed.

   b) The Annual Report should not seem to be propaganda.

B. Criteria for Evaluation:

1. Did membership of the sponsored group adequately represent all relevant interests?

2. Was sufficient information collected regarding the issues raised?

3. Did the conduct of group meetings foster free discussion of issues by all members?

4. Has the program been effective in resolving or reducing environmental conflicts?

5. Did the program contribute to improved management decisions?

6. a) Was the public involvement program efficient in terms of time and money spent, both by MoF and by public members?

   b) Much more complete records of costs must be kept, in order to evaluate and improve efficiency.

7. Were the recommendations of the plan produced in the public involvement process carried out?

C. Effectiveness: Influence on Resource Management:

1. The policy statement should contain an explicit commitment to make use of public involvement recommendations. ("MoF will actively seek to broaden the interdisciplinary forest information base upon which management planning decisions are made.")

2. a) The incorporation of public involvement recommendations in decision-making should be clearly demonstrated.

   b) Representatives of public interest groups need to demonstrate to their constituents that their time has been well spent serving on MoF sponsored committees.

3. If recommendations of sponsored groups are not followed, written explanations of the reasons should be available.

4. Final management plans should be presented at a public hearing, so that whatever decision was made in the end would have to be defended to us all.

5. Monitoring of implementation should be ongoing.

6. Members of the Nelson Watershed Committee are concerned about enforcement of the operational guidelines they are writing. A more formal structure, such as a joint planning team, with decision-making and enforcement authority, may be required.

7. All of our recommendations and input were completely ignored in setting the AAC for the Kootenay TSA.

D. Credibility:

1. Range of options may be considered too narrow. Some segments of the public are not satisfied with public involvement which only regulates development.

2. MoF use of public involvement end products should be documented to demonstrate that the Ministry is sincere.

3. Public involvement raises expectations of moderates. MoF must put sufficient resources into public involvement, fulfilling the commitments made in the policy statement. Otherwise MoF credibility will decline rather than improve.

4. Ministry of Forests Staff:

   a) Public involvement should be carried out by technical staff, not by public relations people.

   b) MoF technical staff should be trained in dealing effectively with the public.

   c) MoF staff conducting public involvement programs must be technically competent to discuss integrated resource management.

   d) MoF staff should respond quickly to questions and requests for information. Long delays give the impression that public involvement is not considered important.

5. Even if a MoF sponsored group and the Ministry have agreed on a management plan, development of the area in question can proceed if other agencies do not agree to the plan. Members of the MoF sponsored group may then feel that their participation has been a waste of time.

6. a) There have been cases in which MoF has agreed to defer harvesting of a particular area, then at the end of the planning process added a proviso allowing salvage logging of beetle-killed timber, including construction of access roads into the area. Public members viewed this as unilateral cancellation of the agreement.

6. b) Cases in which public involvement terms of reference, activities or recommendations accepted by one MoF administrative level are overturned by a higher level are bad for credibility.

XI Editorial Suggestions

Re: Definitions:

1. "Public Involvement Program":

   Expand this definition to include both informing the public and receiving advice from the public.

   "Advisory Status and Sponsored Groups":

   One team indicated the wording was confusing but they did not recommend any specific modifications.

   "Five Year Management and Working Plans":

   One group suggested Forest Licences should be added to the present definition.

2. Some definitions of "public" might be included. (Marshall, Recreation Management Branch)

Re: Policy Statement 1

1. Policy statements 1 and 2 might be combined, for clarity and simplicity.

2. Third line under "Purpose" - remove the phrase "in communities."

3. Second paragraph in "Policy Statement" box, last line - substitute another word for "community."

4. Paragraph (6), 4th line, under "conditions" - substitute the word "those" for "the publics."

Re: Policy Statement 3

1. Paragraph (b), 2nd line, in "Policy Statement" box - reference should also be made to recreation and grazing in addition to use of forest land and rates of harvest.

2. The participants were concerned that public involvement in developing and evaluating forest management alternatives for the TSA plan may be impossible because these plans may be too general for the public to address. Because the TSA planning process is unclear and with limited funding, it was felt that paragraph (c) should be omitted. Public identification of issues (b) and public review of the draft final plan (d) would be adequate.

3. In "Policy Statement" box - it has been suggested to change "influence" to:

   "contribute to"
   "evaluate and comment on"

Re: Policy Statement 4

1. TFL responsibilities should be more specific, i.e., Section 4(c) of the Forest Act should be quoted.

2. In the "Policy Statement" box, 2nd line - substitute the word "must for "shall".

3. In "procedures", paragraph 2 - specify two prominent advertisements in the local press. In addition, notices should be posted on community bulletin boards.

4. In "procedures", paragraph 2 - specify seeking "written" public response.

5. In "procedures", paragraph 2 - the minimum public review period of the TFL Management and Working Plans (p. 7-5) may have to be longer than 30 days. A 30 to 90 day period should be stipulated.

Re: Policy Statement 5

1. Under "purpose", 6th line - change public involvement activities", to "opportunities".

Re: Policy Statement 6

1. Statement (a) at the bottom of the page should be changed to reflect responsibility for budgeting for funds rather than actually providing the funds for support services.

Re: Policy Statement 7

1. In the "policy statement" box - reference should be made to publishing an evaluation of the processes used and the results obtained.

2. In the "policy statement" box - statement (d) should have the phrase "at the request of the public participants" deleted.